

# EXHIBIT A

**CHELLI & BUSH**

By: Michael T. Madaio, Esq.

ID# 070752013

149 New Dorp Lane

Staten Island, New York 10306

(718) 987-8444

(718) 667-8187 (f)

Attorneys for Plaintiff

DELWYN LEWIS and JILLIAN  
ALVAREZ,

Plaintiff(s),

v.

CELADON TRUCKING SERVICES,  
INC., ERIC GLEN GEIGER SR., JOHN  
DOES (1-10) (said names being fictitious  
and unknown persons), and ABC CORP  
(1-10) (said names being fictitious and  
unknown entities)

Defendant(s),

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION: UNION COUNTY

DOCKET NO.:

CIVIL ACTION

COMPLAINT

Plaintiffs, Delwyn Lewis and Jillian Alvarez, by way of Complaint against the above-named Defendants, alleges as follows:

**FIRST COUNT**

1. Plaintiff, Delwyn Lewis, at the time of the commencement of this action, is an individual residing at 311 Gordon Street, Staten Island, Richmond County, New York.
2. Plaintiff, Jillian Alvarez, at the time of the commencement of this action, is an individual residing at 311 Gordon Street, Staten Island, Richmond County, New York.
3. Upon information and belief, Defendant, Celadon Trucking Services, Inc., is a New Jersey corporation with its headquarters located at 1925 W 450 South, Columbus, Indiana, and at all relevant times the owner of a commercial motor vehicle bearing Indiana license plate number "2388841".

4. Upon information and belief, Defendant, Eric Glen Geiger Sr., is an individual residing at 2731 Beckon Dr, Edgewood, Maryland 21040, and at all relevant times the operator of the aforementioned commercial motor vehicle bearing Indiana license plate number "2388841".

5. On or about April 24, 2017, at or around 11:15 a.m., Plaintiffs, Delwyn Lewis and Jillian Alvarez, were passengers in a motor vehicle that was traveling westbound on I-95 (otherwise referred to as the "New Jersey Turnpike") in Elizabeth, Union County, New Jersey.

6. At the aforementioned time and place, Defendant, Eric Glen Geiger Sr., operated the aforementioned motor vehicle bearing Indiana license plate number "2388841", in a negligent and careless manner, without making proper observations, without the exercise of reasonable and due care, without keeping his vehicle under adequate control, without maintaining his appropriate distance and/or lane of travel, without yielding the right of way and/or without due caution and circumspection, causing his vehicle to strike the plaintiff's vehicle.

7. At all relevant times, Defendant, Celadon Trucking Services, Inc., was the registered owner of the above-mentioned motor vehicle bearing Indiana license plate number "2388841".

8. As a direct and proximate result of the negligence and carelessness of the Defendants, Celadon Trucking Services, Inc. and Eric Glen Geiger Sr, in the manner in which they owned, operated, maintained, controlled, and/or supervised the above-mentioned motor vehicle, a collision(s) occurred, and the Plaintiffs, Delwyn Lewis and Jillian Alvarez, were caused to sustain severe, permanent and painful injuries, incurred and will continue to incur medical expenses in an effort to cure themselves of their injuries, and were otherwise prevented from attending to their regular pursuits and duties.

**WHEREFORE**, Plaintiffs, Delwyn Lewis and Jillian Alvarez, demands judgment

against all of the Defendants jointly, severally, and alternatively, for compensatory damages, interest, costs of suit, attorneys' fees, and such other relief as the court deems equitable and just.

### **SECOND COUNT**

1. Plaintiff repeats and re-alleges all prior allegations as though fully set forth herein.
2. At all relevant time, Defendants, John Doe(s) and ABC Corp.(s) (their names being fictitious), were individuals and/or corporate entities whose identities are unknown to the plaintiff, and who contributed to the happening of the aforesaid accident by virtue of negligent and careless ownership and/or operation of the aforementioned motor vehicle, and/or negligent and careless repairs and maintenance to the aforementioned motor vehicle, resulting in it striking the plaintiff's vehicle.
3. As a direct and proximate result of the negligence and carelessness of the defendants, John Doe(s) and ABC Corp.(s), together with that of Defendants, Celadon Trucking Services, Inc. and Eric Glen Geiger Sr., the plaintiff was severely and permanently injured as previously set forth herein at length.

**WHEREFORE**, Plaintiffs, Delwyn Lewis and Jillian Alvarez, demands judgment against all of the Defendants jointly, severally, and alternatively, for compensatory damages, interest, costs of suit, attorneys' fees, and such other relief as the court deems equitable and just.

**JURY DEMAND**

Plaintiff demands a trial by jury as to all issues.

**DESIGNATION OF TRIAL COUNSEL**

The undersigned hereby designates Michael T. Madaio, Esq. as trial counsel for the within matter.

**CERTIFICATION PURSUANT TO R. 4:5-1**

The undersigned, Michael T. Madaio, Esq., hereby certifies on behalf of the plaintiff as follows:

1. I am attorney admitted to practice law in the State of New Jersey, and I am counsel for the above noted plaintiff in the subject action.
2. The matter in controversy is not, to my knowledge, the subject of any other pending action in any Court or pending arbitration proceeding, nor is any other action or arbitration proceeding contemplated at this time.
3. There are no other parties who should be joined in this action that we are aware of at the present time.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: November 8, 2017  
Staten Island, New York

By: 

Michael T. Madaio, Esq.  
ID# 070752013  
CHELLI & BUSH  
Attorneys for Plaintiff  
149 New Dorp Lane  
Staten Island, New York 10306

LAW OFFICES  
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10306  
(718) 987-8444  
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## Civil Case Information Statement

### Case Details: UNION | Civil Part Docket# L-003980-17

**Case Caption:** LEWIS DELWYN VS CELADON TRUCKING  
SER VICES, IN

**Case Initiation Date:** 11/08/2017

**Attorney Name:** MICHAEL T MADAIO

**Firm Name:** CHELLI & BUSH

**Address:** 149 NEW DORP LN  
STATEN ISLAND NY 10306

**Phone:**

**Name of Party:** PLAINTIFF : Lewis, Delwyn

**Name of Defendant's Primary Insurance Company**  
(if known): ILLINOIS NATIONAL INS CO

**Case Type:** AUTO NEGLIGENCE-PERSONAL INJURY (NON-  
VERBAL THRESHOLD)

**Document Type:** Complaint with Jury Demand

**Jury Demand:** YES - 6 JURORS

**Hurricane Sandy related?** NO

**Is this a professional malpractice case?** NO

**Related cases pending:** NO

**If yes, list docket numbers:**

**Do you anticipate adding any parties (arising out of same  
transaction or occurrence)?** NO

### THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

**Do parties have a current, past, or recurrent relationship?** NO

**If yes, is that relationship:**

**Does the statute governing this case provide for payment of fees by the losing party?** NO

**Use this space to alert the court to any special case characteristics that may warrant individual  
management or accelerated disposition:**

**Do you or your client need any disability accommodations?** NO

**If yes, please identify the requested accommodation:**

**Will an interpreter be needed?** NO

**If yes, for what language:**

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule 1:38-7(b)*

11/08/2017  
Dated

/s/ MICHAEL T MADAIO  
Signed

ESSEX COUNTY - CIVIL DIVISION  
SUPERIOR COURT OF NJ  
465 MARTIN LUTHER KING JR BLVD  
NEWARK NJ 07102

TRACK ASSIGNMENT NOTICE

COURT TELEPHONE NO (973) 776-9300  
COURT HOURS 8:30 AM - 4:30 PM

DATE: AUGUST 23, 2017  
RE: CAVALCANTE VS PEREZ  
DOCKET: ESX L -006023 17

THE ABOVE CASE HAS BEEN ASSIGNED TO: TRACK 2.

DISCOVERY IS 300 DAYS AND RUNS FROM THE FIRST ANSWER OR 90 DAYS  
FROM SERVICE ON THE FIRST DEFENDANT, WHICHEVER COMES FIRST.

THE PRETRIAL JUDGE ASSIGNED IS: HON JEFFREY B. BEACHAM

IF YOU HAVE ANY QUESTIONS, CONTACT TEAM 001  
AT: (973) 776-9300.

IF YOU BELIEVE THAT THE TRACK IS INAPPROPRIATE YOU MUST FILE A  
CERTIFICATION OF GOOD CAUSE WITHIN 30 DAYS OF THE FILING OF YOUR PLEADING.  
PLAINTIFF MUST SERVE COPIES OF THIS FORM ON ALL OTHER PARTIES IN ACCORDANCE  
WITH R.4:5A-2.

ATTENTION:

ATT: BARRY FREDSON  
FREDSON & STATMORE LLC  
915 CLIFTON AVENUE  
STE 100  
CLIFTON NJ 07013-2724

JUMJJB3

Record Bureau Copy



UNN-L-003980-17 12/01/2017 2:54:19 PM Pg 1 of 1 Trans ID: LCV2017566997

DELWYN LEWIS, ET AL

Plaintiff

VS

CELADON TRUCKING SERVICES, INC., ET AL

Defendant



20171108115206

Superior Court Of New Jersey

UNION Venue

Docket Number: UNN L 3980 17

**Person to be served** (Name and Address):ERIC GLEN GEIGER SR.  
2731 BECKON DRIVE  
EDGEWOOD MD 21040

By serving: ERIC GLEN GEIGER SR.

Attorney: MICHAEL T. MADAIO, ESQ.

Papers Served: SUMMONS AND COMPLAINT, CIS, CERTIFICATION

Service Data: ☒ Served Successfully ☐ Not Served**AFFIDAVIT OF SERVICE**

(For Use by Private Service)

Cost of Service pursuant to R. 4:4-3(c)

\$ \_\_\_\_\_

Date/Time: 11/12/2017 AT 11:45 AM

Name of Person Served and relationship/title:

☐ Delivered a copy to him/her personally

Janice Geiger, Wife

☒ Left a copy with a competent household member over 14 years of age residing therein (indicate name & relationship at right)☐ Left a copy with a person authorized to accept service, e.g. managing agent, registered agent, etc. (indicate name & official title at right)**Description of Person Accepting Service:**

SEX: F AGE: 45-49 HEIGHT: 5'0-5'2 WEIGHT: 166-180 SKIN: Black HAIR: Black OTHER: \_\_\_\_\_

**Unserved:**

- ☐ Defendant is unknown at the address furnished by the attorney
- ☐ All reasonable inquiries suggest defendant moved to an undetermined address
- ☐ No such street in municipality
- ☐ Defendant is evading service
- ☐ Appears vacant
- ☐ No response on: \_\_\_\_\_

Date/Time: \_\_\_\_\_

Date/Time: \_\_\_\_\_

Date/Time: \_\_\_\_\_

Other: \_\_\_\_\_

**Served Data:**

Subscribed and Sworn to me this

20th day of November, 2017

Notary Signature: \_\_\_\_\_

Name of Notary

Commission Expiration

I, Michael Meade

was at the time of service a competent adult, over the age of 18 and not having direct interest in the litigation. I declare under penalty of perjury that the foregoing is true and correct.

Signature of Process Server

11/20/2017  
Date

Name of Private Server: Michael Meade Address: 2009 Morris Avenue UNION, NJ 07083 Phone: (800) 672-1952

MARY PROVINS  
COUNTY OF ANNE ARUNDEL  
My Commission Expires: 09/08/2020

JB